

RANALLI & ZANIEL, LLC
2400 WEST HORIZON RIDGE PARKWAY
HENDERSON, NEVADA 89052
TELEPHONE: (702) 477-7774 FAX: (702) 477-7778

GEORGE M. RANALLI, ESQ.

Nevada Bar No. 5748

JOHN WILLIAM KIRK, ESQ.

Nevada Bar No. 4654

RANALLI & ZANIEL, LLC

2400 W. Horizon Ridge Parkway

Henderson, Nevada 89052

Telephone: (702) 477-7774

Facsimile: (702) 477-7778

Attorney for Defendant,

STATE FARM MUTUAL AUTOMOBILE

INSURANCE COMPANY

UNITED STATES DISTRICT COURT

DISTRICT COURT OF NEVADA

ANDREA VALDEZ, individually,)

ANDREA VALDEZ, as Legal Guardian)

Of MAILI JUAREZ-VALDEZ, a minor)

)

Plaintiff,) CASE NO.: 2:14-cv-01638-RFB-VCF

)

)

vs.)

)

STATE FARM MUTUAL AUTOMOBILE)

INSURANCE COMPANY, DOES I-X, and)

ROE CORPORATIONS I-X, inclusive,)

)

Defendant.)

)

**STIPULATION AND ORDER TO REMAND THE CLAIM OF ANDREA VALDEZ, AS
LEGAL GUARDIAN OF MAILI JUAREZ-VALDEZ, A MINOR TO STATE COURT**

BASED UPON THE PARTIES PREVIOUS STIPULATION dismissing the
claims of **ANDREA VALDEZ**, individually, and the claims of **ANDREA
VALDEZ** as Legal Guardian of **MAILI JUAREZ-VALDEZ**, a minor, as
contained in Plaintiff's Complaint on file herein and identified
as: (1) Plaintiff's second cause of action for breach of the
covenant of good faith and fair dealing [Bad Faith];

(2) Plaintiff's third cause of action for unjust enrichment; and
 (3) Plaintiff's fourth cause of action for violation of Nevada's
 Fair Claims Practices Act-NRS 686A.310; and, (4) any claims for
 punitive damages with prejudice;[Document No.20]

THE PARTIES HEREBY FURTHER STIPULATE AND AGREE that
 Plaintiff, **ANDREA VALDEZ's** remaining claim as Legal Guardian of
MAILI JUAREZ-VALDEZ for breach of contract has a value of less
 than **FIFTY THOUSAND DOLLARS (\$50,000.00.)**

THE PARTIES FURTHER STIPULATE AND AGREE that because the
 amount in controversy currently does not exceed \$75,000.00 that
 diversity jurisdiction is not present.

Therefore, **THE PARTIES STIPULATE AND AGREE** that this case
 be remanded to the Clark County District Court, Case No.: A-14-
 7066517-C in order to allow the Plaintiff to pursue her claim on
 behalf of the minor **MAILI JUAREZ-VALDEZ** in Nevada State Court.

June __, 2015

RANALLI & ZANIEL, LLC

/s/: John W. Kirk, Esq.

GEORGE M. RANALLI, ESQ.

Nevada Bar No. 5748

JOHN WILLIAM KIRK, ESQ.

Nevada Bar No. 4654

2400 W. Horizon Ridge Parkway
 Henderson, Nevada 89052
 Attorney for Defendant

June __, 2015

RICHARD HARRIS LAW FIRM

/s/: A.J. Sharp, Esq.

A.J. SHARP, ESQ.

Nevada Bar No. 11457

801 South Fourth Street
 Las Vegas, Nevada 89101
 Attorneys for Plaintiffs

ORDER

Pursuant to the above Stipulation of the Parties;

IT IS ORDERED that the only claim remaining for adjudication by this court is the claim of **ANDREA VALDEZ**, as Legal Guardian for **MAILI JUAREZ-VALDEZ**, a minor, for breach of contract.

Pursuant to Stipulation of the Parties it is agreed the remaining claim has a value of less than **FIFTY THOUSAND DOLLARS (\$50,000.00)** ;

THEREFORE IT IS ORDERED, ADJUDGED AND DECREED that the above noted matter is remanded to the EIGHTH JUDICIAL DISTRICT COURT, CLARK COUNTY, NEVADA, under case number A-14-7066517-C to allow pursuit of the breach of contract claim.

DATED this 13th day of July , 2015.



RICHARD F. BOULWARE, II
United States District Judge